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17 *Attorneys for Plaintiff*
18 ORACLE AMERICA, INC.

19 **UNITED STATES DISTRICT COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**
21 **SAN FRANCISCO DIVISION**

22 ORACLE AMERICA, INC.

Case No. CV 10-03561 WHA

23 Plaintiff,

**ORACLE AMERICA, INC.'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF THE
DECLARATION OF FRED NORTON IN
SUPPORT OF ORACLE AMERICA,
INC.'S MOTION TO COMPEL
PRODUCTION OF DOCUMENTS**

24 v.

25 GOOGLE, INC.

Dept.: Courtroom 4, 3rd Floor
Judge: Honorable Donna M. Ryu

26 Defendant.

1 Pursuant to Local Rule 79-5(d), Plaintiff Oracle America, Inc. (“Oracle”) hereby moves to file
2 portions of the Declaration of Fred Norton In Support of Oracle’s Motion to Compel Production of
3 Documents (“Norton Declaration”).

4 The Order Approving Stipulated Protective Order Subject to Stated Conditions entered in this
5 case (Dkt. No. 68) states that when material has been designated as Confidential or Highly Confidential
6 – Attorneys’ Eyes Only, a party may not file it in the public record, but must seek to file it under seal
7 pursuant to Local Rule 79-5. (December 17, 2010 Stipulated Protective Order (Docket No. 66) § 14.4.)
8 Exhibits A through G, L, and S through V have been designated Confidential or Highly Confidential –
9 Attorneys’ Eyes Only by Google, Inc. (“Google”), thus Oracle moves to seal portions of the record
10 accordingly. As Google has recently moved under General Order 59 to redact portions of the
11 discovery-hearing transcript reflected in Exhibit H, Oracle submits Exhibit H under seal out of an
12 abundance of caution. Oracle states no position as to whether disclosure of materials marked by
13 Google as Confidential or Highly Confidential – Attorneys’ Eyes Only material, or whether public
14 filing of the transcript reflected in Exhibit H, would cause harm to Google.

15 Dated: August 15, 2011

16 BOIES, SCHILLER & FLEXNER LLP

17 By: /s/ Fred Norton
18 Fred Norton

19 *Attorneys for Plaintiff*
ORACLE AMERICA, INC.